

U.S. BANKRUPTCY COURT
Northern DISTRICT OF Georgia

In Re: _____ : Case No. 23-56108-bem
Debtor (s) Shelly Wells Baker : Chapter 7 (Judge Barbara Ellis-Morris)
Creditor (s) _____ : **MOTION FOR AUTHORITY TO REDEEM**
Address The Southern Credit Union : **PERSONAL PROPERTY AND APPROVAL**
430 E. Lanier Ave : **OF ASSOCIATED FINANCING AND**
Fayetteville, Ga. 30214 : **ATTORNEY FEES UNDER 11 U.S.C. 722**

Now come (s) the Debtor (s) by and through counsel, and moves the court pursuant to 11 U.S.C. 722 and Bankruptcy Rule 6008 for a Redemption Order on the following grounds:

1. The item to be redeemed is tangible personal property intended primarily for personal, family or household use is more particularly described as follows:

Year 2018 Make Chevy Model Colorado
VIN # 1GCGSCEN9J1179147

2. The interest of the Debtor (s) in such property is exempt or has been abandoned by the estate and the debt (which is secured by said property to the extent of the allowed secured claim of the Creditor) is a dischargeable consumer debt.
3. The allowed secured claim of said Creditor for purposes of redemption, the "redemption value", should be determined to be not more than \$ 24,920.⁰⁰ as evidenced by the attached written appraisal.
4. Arrangements have been made by the Debtor (s) to pay to the said Creditor up to the aforesaid amount in a lump sum should this motion be granted.
5. The payment for this proposed redemption is to be financed through Prizm Financial Co. LLC, with all of the particulars of that financing (interest rate, finance charge, amount financed, total of payments, amount of payments, etc.) set forth in full detail in the attachment(s) hereto. As demonstrated there, the monthly amount, term of the payments and the overall amount of the repayment will be decreased significantly through the proposed redemption. Moreover, the Debtor has agreed to borrow and disperse additional funds in the amount of \$ 700.⁰⁰ from their loan with Prizm Financial Co. LLC, for representation of the debtor(s) in securing for the benefit of the debtor(s) an order granting the debtor(s) the right to redeem under 11 U.S.C. 722 a certain motor vehicle, such compensation being in addition to that previously disclosed and being for services rendered beyond the scope of the legal services to have been rendered for such compensation heretofore disclosed.

WHEREFORE, the Debtor (s) request (s) the Court to order the said Creditor to accept from the Debtor (s) the lump sum payment of the redemption value and release their lien of record. In the event the said Creditor objects to this motion, the Debtor (s) requests the Court to determine the value of the property as of the time of the hearing on such objection.

Attorney for Debtor (s)

Bar No. 077120

NOTICE

Notice is hereby given that unless an objection is made to this motion within 21 days following the date of service below, an order sustaining the motion may be granted by the Court.

CERTIFICATE OF SERVICE

I hereby certify that the foregoing has been served upon: the Creditor's above noted, the U.S. Trustee, and the Chapter 7 Trustee by mailing a copy hereof by first class U.S. Mail on this _____ day of _____, 20____.

Attorney for Debtor (s)

Bar No. 077120

IN THE UNITED STATES BANKRUPTCY COURT
NORTHERN DISTRICT OF GEORGIA
ATLANTA DIVISION

SHELLY WELLS BAKER
Debtor

* CASE NO. 23-56108-bem
* CHAPTER 7
*

CERTIFICATE OF SERVICE

This is to certify that I am over the age of 18 years and that I have this day served a copy of the within and foregoing Motion to Redem upon the parties listed below by placing the same in a properly addressed envelope with adequate postage affixed hereto to assure delivery and depositing in the United States Mail addressed as follows:

Shelly Wells Baker
149 Darwish Dr.
McDonough, GA 30252

S. Gregory Hays
Hays Financial Consulting, LLC
Suite 555
2964 Peachtree Road
Atlanta, GA 30305

The Southern Credit Union
430 E. Lanier Ave.
Fayetteville, GA 30214

This 8th day of September, 2023

Respectfully Submitted,

/s/ Joseph Chad Brannen

Joseph Chad Brannen
Attorney for Debtor
Georgia Bar No. 077120

7147 Jonesboro Rd., Suite G
Morrow, GA 30260
(770) 474-0847